C-6

Idaho Trout Company

IDAHO TROUT PROCESSORS COMPANY

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Kimberly Ogle
U. S. Environmental Protection Agency
NPDES Compliance Unit
OCE 133
1200 6th Avenue
Seattle, WA 98101

July 2, 2012

Dear Ms. Ogle

This letter is to inform you that on June 6, 2012 the Buhl processing center (permit number IDG132001) exceeded the monthly maximum TP concentration of 7.8 mg/L. Lab analysis received on July 2, 2012 described the monthly compliance sample to have a TP concentration of 8.37 mg/L. The calculated load for that day is 0.07 pounds of TP. That loading is only 2.12% of the monthly average limit of 3.3 pounds/day of TP.

To be compliant with Part five, section G.3 of the discharge permit, we will address part a through d.

a. Exceeded the monthly TP concentration limit of 7.8 mg/L. The cause of the exceedence is the reduction of non-polluted water or non-contact water entering the waste treatment lagoon. The intent of reducing the diluting effects of non-contact water is to increase the retention time of the treatment system and decrease loading.
b. The period of noncompliance is from November 8, 2010 to June 6 2012.
c. The TP concentration appears to be settling around seven to eleven mg/L and it is possible that the normal concentration level with may be seven mg/L to ten mg/L with our improved treatment technology that reduces the phosphorus loading to the environment
   Due to the continued elevated TP concentration above our permitted concentration, we have taken measures toward compliance. Those measures include aeration to prevent anaerobic conditions and returning some non-contact water that will dilute the waste stream from the processing plant. Increased aeration should create two beneficial effects. One benefit will be an increase of the population of beneficial organisms that aid in phosphorus assimilation. The other benefit of aeration is to decrease the release of phosphorus from the sludge layer on the bottom. Anaerobic conditions promote the release of

phosphorus from sediments. We may have to return even more non-contact water to the treatment system to further dilute our TP concentration. This is not what we would like to do, but it may be necessary. Increasing flow may increase loading and that is not consistent with our goal of reducing phosphorus loading to the environment.

We would like to summarize by stating that our load for June was only 2.12% of our average limit and 1.06% of our maximum limit. We believe the low May load of 0.09 pounds of TP in our effluent proves that we are accomplishing our goal of reducing our environmental impact of TP loading to the receiving water. During 2008, 1009 and 2010 our average monthly TP loading to the receiving water was 0.700 lbs., 0.465 lbs, and 0.375 lbs. respectively. This shows substantial progressive improvement. A byproduct of this is increased concentration in the waste treatment lagoon. Additionally we provided 24-hour notice to the EPA's Seattle office as well as IDEQ's Twin Falls office on July 2, 2012.

If you have any questions or concerns, please call us at 208-543-6444.

Sincerely,

Dirk Bogaard

Harold Johnson

Cc: Balthasar Buhidar, IDEQ
Chris Gebhardt, US EPA Seattle